

REMARKS

Claims 1-39 were originally presented in the subject application. In response to a restriction requirement, Applicant provisionally elected claims 1-14, 19-27 and 29-37 for prosecution, in a response dated January 13, 2006. Claims 1, 19 and 29 were amended in an Amendment and Response to Office Action dated June 28, 2006. In response to the Notice of Non-Compliant Amendment dated September 21, 2006, claims 15-18, 28, 38-39 were amended to indicate a status of "Withdrawn" instead of "Original" in a response dated September 28, 2006.

Claims 3, 15-18, 28, 38 and 39 have herein been canceled without prejudice. No claims have herein been added. Claims 1, 19 and 29 have hereinabove been amended to more particularly point out and distinctly claim the subject invention. Therefore, claims 1, 2, 4-14, 19-27 and 29-37 remain in this case.

The addition of new matter has been scrupulously avoided. In that regard, the common amendment to independent claims 1, 19 and 29 adds the substance of claim 3. The additional language "into the interface" is supported by existing claim 14.

Applicant respectfully requests reconsideration and withdrawal of the sole remaining ground of rejection.

35 U.S.C. §103 Rejection

The Office Action rejected claims 1-14, 19-27 and 29-37 under 35 U.S.C. §103(a), as allegedly obvious over Becerra, JR. (U.S. Application Publication No. 2003/0169295) in view of Devine et al. (U.S. Application Publication No. 2002/0095399) and further in view of Mujica et al. (U.S. Patent Application Publication No. 2003/0117447). Applicant respectfully, but most strenuously, traverses this rejection as it applies to the amended claims.

Amended claim 1 recites, for example, that having the spreadsheet execute logic of the spreadsheet avoids re-coding of the logic of the spreadsheet into the interface. This

aspect originated in claims 3 and 14 (claim 14 only for the clarification regarding recoding of the spreadsheet logic “into the interface”). With regard to claim 3, the final Office Action indicates that Becerra does not specifically teach that the spreadsheet avoids recoding, instead citing to Devine at numbered paragraph 0549.

However, the cited section of Devine merely indicates un-hiding the spreadsheet application, but keeping the service workbooks hidden in the background. Applicants submit that hiding workbooks has nothing whatever to do with avoiding recoding of the spreadsheet logic in a program interface, only whether the workbooks can be seen. Note that since the Devine hidden workbooks are being imported into Becerra in the final Office Action, it would need to be the case that using the hiding in Becerra would avoid recoding the spreadsheet logic in a program interface. In stark contrast however, Becerra, in the last sentence of numbered paragraph 0011 specifically teaches recoding the logic into the “control panel:”

The underlying simulation is generated based on spreadsheet cells selected by the user during the control panel creation process. When cells are selected, any underlying algorithms or mathematical formulas associating input data values with output data values are automatically imported into the control panel file. Thus, the algorithms and mathematical relationships originally created using the spreadsheet program are automatically replicated in the control panel file as a mathematical model of the relationship between selected input and output cells.

Thus, even if, for the sake of argument, Devine’s hiding of workbooks were somehow found to be related to avoiding recoding of the spreadsheet logic into a program interface, the teaching of Becerra would be in direct conflict therewith. Thus, one skilled in the art would not be motivated to utilize Devine’s workbook hiding.

In addition, Applicant’s submit that using the spreadsheet as a calculation engine, rather than recoding the program to perform the logic of the spreadsheet, significantly reduces the development time for such a program, saving time and money. See the present application at numbered paragraph 0051.

Against the aspect of the spreadsheet being unchangeable by a user, the final Office Action alleges that while Becerra does not specifically disclose this aspect, but instead cites to Mujica for user locking of some or all cells of a spreadsheet. However, Applicants submit cell or spreadsheet locking for users is not necessary in Becerra, since by the time a user sees the graphical simulation created, the spreadsheet logic has already been coded into the simulation. See, for example, Becerra at numbered paragraph 0011 (end). There simply is no spreadsheet at the user stage in the Becerra simulation to lock.

For all the above reasons, Applicant submits claim 1 cannot be made obvious over Becerra in view of Devine, and in further view of Mujica.

Independent claims 19 and 29 contain limitations similar to that argued above with respect to claim 1. Thus, the remarks above apply equally to those claims. Therefore, Applicant submits that claims 19 and 29 also cannot be rendered obvious over Becerra in view of Devine, and in further view of Mujica.

Applicant submits that the dependent claims are allowable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their additional limitations.

For example, claim 2 recites that the spreadsheet of the program is hidden from the user. Against claim 2, the Office Action cites to Devine at numbered paragraph 0549, and alleges it would somehow be obvious to import hiding the spreadsheet into Becerra. However, even if for the sake of argument we assume that Devine teaches hiding the spreadsheet, it makes no sense to do so in Becerra, since Becerra codes the spreadsheet logic into the control panel. See Becerra at numbered paragraph 0011 quoted previously. Thus, there is no spreadsheet to hide by the time a user sees the simulation; the logic has already been coded into the control panel. Similar arguments apply to claims 20 and 30.

Therefore, Applicant submits that claims 2, 20 and 30 cannot be made obvious over Becerra in view of Devine, and in further view of Mujica.

As another example, claim 14 recites replacing by other than the user one or more calculations of the spreadsheet and avoiding recoding of the interface.

Against claim 14, the final Office Action alleges that Becerra teaches replacing calculations via use of the slider, citing numbered paragraph 0042 therein. However, a careful reading of the cited section of Becerra reveals that the sliders change the input values in the associated data cells, and not the underlying mathematical relationships between input and output. Changing the input data certainly changes the output, but does not replace any calculations acting on the input data.

Moreover, since the underlying mathematical relationships are coded in Becerra (see Becerra at 0011 quoted above), any changes thereto will also need to be recoded. Thus, avoiding recoding as claimed cannot be performed in Becerra.

Therefore, Applicant submits that claim 14 cannot be made obvious over Becerra in view of Devine, and in further view of Mujica. A similar limitation exists in claim 27, which also cannot be obviated over the cited art for the same reasons.

Applicants' prior response argued that each of Becerra, Devine and Mujica is improperly cited against the present application as non-analogous art. Applicants continue to maintain the same. However, in the interests of better focusing this response, Applicants simply refer to the prior response.

Finally, Applicant expressly reserves the right to subsequently challenge the propriety of any claims to earlier filed applications contained in the cited art.

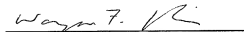
#### CONCLUSION

Applicant submits that the dependent claims not specifically addressed herein are allowable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their additional limitations.

For all the above reasons, Applicant maintains that the claims of the subject application define patentable subject matter and earnestly requests allowance of claims 1, 2, 4-14, 19-27 and 29-37.

If a telephone conference would be of assistance in advancing prosecution of the subject application, Applicant's undersigned attorney invites the Examiner to telephone him at the number provided.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Wayne F. Reinke", is written over a horizontal line.

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